

Matter Worked Detail Report

Worked between 01/01/1900 thru 12/31/3000

0748.000303: Camelot Construction

<i>Date Worked</i>	<i>Timekeeper</i>	<i>Description</i>	<i>Hours</i>	<i>Hourly Rate</i>	<i>Fees</i>
Acklin, Amanda					
06/09/2014	Acklin, Amanda	Review and update file regarding scheduling order, email regarding same, update deadlines regarding same, conferences regarding same	0.70	155.00	108.50
06/11/2014	Acklin, Amanda	Draft and revise proposed discovery plan, legal research regarding same and email regarding same	1.10	155.00	170.50
06/24/2014	Acklin, Amanda	Exchange email regarding pre trial conference, review and revise deadlines regarding scheduling order, update file regarding same	0.30	155.00	46.50
06/25/2014	Acklin, Amanda	Update file regarding scheduling order and revise deadlines regarding same	0.30	155.00	46.50
08/13/2014	Acklin, Amanda	Update file regarding motion to withdraw and notice of waiver of oral argument	0.30	155.00	46.50
09/24/2014	Acklin, Amanda	Update deadline regarding deadline for defendant to enter new counsel	0.10	155.00	15.50
10/03/2014	Acklin, Amanda	Update file regarding order regarding Answer filed in the case	0.10	155.00	15.50
Total For Acklin, Amanda			Total Hours 2.90		Total Fees 449.50

Leins, Christopher M

01/23/2014	Leins, Christopher	Review file and accurint report	0.50	280.00	140.00
01/24/2014	Leins, Christopher	Review and revise complaint	0.70	280.00	196.00
01/27/2014	Leins, Christopher	Revise interest calculation and complaint	0.30	280.00	84.00
02/01/2014	Leins, Christopher	Revise complaint	0.30	280.00	84.00
02/11/2014	Leins, Christopher	Review and prepare complaint for filing	0.20	280.00	56.00
02/28/2014	Leins, Christopher	Prepare correspondence regarding service by long-arm statute	0.20	280.00	56.00
03/11/2014	Leins, Christopher	Legal research regarding service under long-arm statute	0.20	280.00	56.00
03/12/2014	Leins, Christopher	Review affidavit of service on secretary of commonwealth	0.20	280.00	56.00
03/13/2014	Leins, Christopher	Prepare correspondence to Fund office regarding status of motion for default	0.20	280.00	56.00
03/13/2014	Leins, Christopher	Review and revise declaration of Alex Dyer in support of motion for default judgment	0.50	280.00	140.00
04/07/2014	Leins, Christopher	Prepare correspondence regarding settlement	0.20	255.00	51.00
04/11/2014	Leins, Christopher	Prepare correspondence to Fund Office regarding amendment of complaint	0.20	255.00	51.00
04/11/2014	Leins, Christopher	Conference regarding amended complaint	0.20	255.00	51.00
04/14/2014	Leins, Christopher	Prepare correspondence regarding amended complaint	0.20	255.00	51.00
04/14/2014	Leins, Christopher	Conference regarding amended complaint	0.10	255.00	25.50
04/14/2014	Leins, Christopher	Review and revise amended complaint	0.50	255.00	140.00
04/15/2014	Leins, Christopher	Revise amended complaint	0.70	255.00	178.50
04/15/2014	Leins, Christopher	Conference regarding amended complaint	0.10	255.00	25.50
04/16/2014	Leins, Christopher	Review amended complaint	0.30	255.00	76.50
04/16/2014	Leins, Christopher	Prepare correspondence regarding revisions to amended complaint	0.20	255.00	51.00
04/17/2014	Leins, Christopher	Prepare correspondence regarding status of collective	0.20	255.00	51.00

bargaining agreement

04/17/2014	Leins, Christopher	Telephone call regarding amendment of complaint	0.10	255.00	25.50
04/17/2014	Leins, Christopher	Conference regarding amended complaint	0.10	255.00	25.50
04/22/2014	Leins, Christopher	Telephone call regarding amended complaint	0.10	255.00	25.50
04/22/2014	Leins, Christopher	Review and revise amended complaint	0.40	255.00	102.00
04/24/2014	Leins, Christopher	Telephone call regarding acceleration of withdrawal liability	0.10	255.00	25.50
05/22/2014	Leins, Christopher	Review answer and grounds of defense	0.20	255.00	51.00
05/29/2014	Leins, Christopher	Telephone call with opposing counsel regarding settlement	0.20	255.00	51.00
05/29/2014	Leins, Christopher	Review file	0.30	255.00	76.50
05/29/2014	Leins, Christopher	Prepare correspondence regarding status of case	0.20	255.00	51.00
06/03/2014	Leins, Christopher	Prepare correspondence to opposing counsel	0.20	255.00	51.00
06/04/2014	Leins, Christopher	Prepare correspondence regarding response to opposing counsel's request for documents	0.20	255.00	51.00
06/09/2014	Leins, Christopher	Prepare correspondence regarding joint discovery plan and opposing counsel's request for documents	0.20	255.00	51.00
06/10/2014	Leins, Christopher	Prepare correspondence to opposing counsel regarding discovery plan and documents in support of withdrawal liability assessment	0.70	255.00	178.50
06/11/2014	Leins, Christopher	Review and revise memorandum in support of default judgment	0.40	255.00	102.00
06/11/2014	Leins, Christopher	Review file	0.30	255.00	76.50
06/11/2014	Leins, Christopher	Review and revise joint discovery plan	0.60	255.00	153.00
06/11/2014	Leins, Christopher	Prepare correspondence to opposing counsel regarding joint discovery plan	0.20	255.00	51.00
06/11/2014	Leins, Christopher	Telephone call regarding joint discovery plan	0.30	255.00	76.50
06/11/2014	Leins, Christopher	Prepare correspondence regarding consent to judgment and settlement in lieu of execution	0.20	255.00	51.00
06/13/2014	Leins, Christopher	Review and analyze settlement offer	0.50	255.00	127.50
06/13/2014	Leins, Christopher	Prepare correspondence regarding settlement offer	0.30	255.00	76.50
06/13/2014	Leins, Christopher	Review file	0.70	255.00	178.50
06/13/2014	Leins, Christopher	Conference regarding settlement negotiations	0.10	255.00	25.50
06/18/2014	Leins, Christopher	Prepare correspondence with opposing counsel regarding settlement proposal	0.10	255.00	25.50
06/23/2014	Leins, Christopher	Telephone call to business representative at local union	0.30	255.00	76.50
06/23/2014	Leins, Christopher	Review file	0.40	255.00	102.00
06/23/2014	Leins, Christopher	Prepare settlement recommendation to Fund office	1.10	255.00	280.50
06/24/2014	Leins, Christopher	Revise settlement recommendation	0.80	255.00	204.00
06/24/2014	Leins, Christopher	Conference regarding settlement recommendation	0.20	255.00	51.00
06/24/2014	Leins, Christopher	Telephone call to opposing counsel regarding settlement negotiations	0.10	255.00	25.50
06/24/2014	Leins, Christopher	Review and analyze scheduling order	0.10	255.00	25.50
06/30/2014	Leins, Christopher	Review and analyze settlement proposal from employer	0.30	255.00	76.50
06/30/2014	Leins, Christopher	Prepare correspondence regarding settlement proposal from employer	0.20	255.00	51.00

06/30/2014	Leins, Christopher	Prepare correspondence regarding settlement negotiations, conference regarding same	0.60	255.00	153.00
07/07/2014	Leins, Christopher	Draft Rule 26(a) initial disclosures	1.00	255.00	255.00
07/07/2014	Leins, Christopher	Prepare correspondence to Fund Office regarding initial disclosures	0.10	255.00	25.50
07/08/2014	Leins, Christopher	Prepare correspondence to opposing counsel regarding initial disclosures	0.20	255.00	51.00
07/09/2014	Leins, Christopher	Telephone call with opposing counsel regarding delinquent contribution payment and settlement negotiations	0.30	255.00	76.50
07/10/2014	Leins, Christopher	Review defendant's initial disclosures and documents produced	0.60	255.00	153.00
07/10/2014	Leins, Christopher	Telephone call with Fund Office regarding audit	0.30	255.00	76.50
07/10/2014	Leins, Christopher	Review employer audit	0.40	255.00	102.00
07/10/2014	Leins, Christopher	Telephone call with opposing counsel regarding settlement negotiations	0.30	255.00	76.50
07/23/2014	Leins, Christopher	Telephone call with opposing counsel regarding settlement negotiations	0.20	255.00	51.00
07/23/2014	Leins, Christopher	Prepare correspondence regarding settlement offer	0.20	255.00	51.00
07/24/2014	Leins, Christopher	Conference regarding settlement offer	0.10	255.00	25.50
07/24/2014	Leins, Christopher	Prepare settlement recommendation	0.60	255.00	153.00
07/25/2014	Leins, Christopher	Prepare correspondence regarding counteroffer	0.10	255.00	25.50
07/25/2014	Leins, Christopher	Prepare correspondence to opposing counsel regarding settlement negotiations	0.20	255.00	51.00
07/30/2014	Leins, Christopher	Review and prepare correspondence regarding motion to withdraw	0.20	255.00	51.00
07/31/2014	Leins, Christopher	Review Answer and assess need for discovery	0.50	255.00	127.50
08/01/2014	Leins, Christopher	Draft interrogatories	2.00	255.00	510.00
08/01/2014	Leins, Christopher	Draft requests for production of documents	2.00	255.00	510.00
08/01/2014	Leins, Christopher	Conference regarding discovery responses	0.10	255.00	25.50
08/04/2014	Leins, Christopher	Prepare correspondence regarding discovery requests	0.10	255.00	25.50
08/08/2014	Leins, Christopher	Review file and discovery deadlines	0.20	255.00	51.00
08/12/2014	Leins, Christopher	Review motion for miscellaneous relief	0.10	255.00	25.50
08/12/2014	Leins, Christopher	Prepare correspondence regarding withdrawal of opposing counsel	0.20	255.00	51.00
08/20/2014	Leins, Christopher	Prepare correspondence regarding potential bankruptcy of employer	0.20	255.00	51.00
08/20/2014	Leins, Christopher	Telephone call regarding discovery requests	0.10	255.00	25.50
08/22/2014	Leins, Christopher	Review file	0.20	255.00	51.00
08/22/2014	Leins, Christopher	Conference regarding status of case	0.30	255.00	76.50
08/27/2014	Leins, Christopher	Review discovery requests and scheduling orders	0.20	255.00	51.00
08/28/2014	Leins, Christopher	Review bankruptcy docket	0.20	255.00	51.00
08/28/2014	Leins, Christopher	Review file	0.20	255.00	51.00
08/28/2014	Leins, Christopher	Telephone call to employer	0.10	255.00	25.50
09/03/2014	Leins, Christopher	Research status of employer	0.30	255.00	76.50
09/03/2014	Leins, Christopher	Prepare correspondence to opposing counsel regarding discovery and motion for summary judgment	0.30	255.00	76.50

09/03/2014	Leins, Christopher	Review and prepare correspondence to business representative for local union regarding status of employer	0.30	255.00	76.50
09/04/2014	Leins, Christopher	Review additional information from local union regarding employer status	0.20	255.00	51.00
09/04/2014	Leins, Christopher	Telephone call with employer regarding settlement negotiations	0.50	255.00	127.50
09/04/2014	Leins, Christopher	Research default for company proceeding pro se	0.40	255.00	102.00
09/04/2014	Leins, Christopher	Draft motion to strike answer, supporting memorandum and proposed order	1.80	255.00	459.00
09/05/2014	Leins, Christopher	Telephone call to employer regarding settlement negotiations	0.10	255.00	25.50
09/08/2014	Leins, Christopher	Research regarding employer's obligations under Collective Bargaining Agreement	0.30	255.00	76.50
09/09/2014	Leins, Christopher	Telephone call to employer regarding settlement negotiations	0.10	255.00	25.50
09/09/2014	Leins, Christopher	Draft correspondence to employer regarding settlement	0.30	255.00	76.50
09/11/2014	Leins, Christopher	Review and prepare correspondence to employer regarding settlement negotiations	0.20	255.00	51.00
09/16/2014	Leins, Christopher	Prepare correspondence with employer regarding motion to strike Answer	0.20	255.00	51.00
09/18/2014	Leins, Christopher	Draft notice of waiver of oral argument	0.20	255.00	51.00
09/18/2014	Leins, Christopher	Prepare correspondence regarding motion to strike answer	0.20	255.00	51.00
09/19/2014	Leins, Christopher	Prepare correspondence regarding filing motion to strike	0.10	255.00	25.50
09/19/2014	Leins, Christopher	Review motion to strike for filing	0.20	255.00	51.00
09/23/2014	Leins, Christopher	Review case docket	0.10	255.00	25.50
09/24/2014	Leins, Christopher	Review and prepare correspondence regarding order on motion to strike and default of defendant	0.20	255.00	51.00
10/06/2014	Leins, Christopher	Prepare correspondence regarding motion for default judgment	0.20	255.00	51.00
10/06/2014	Leins, Christopher	Review and revise request for entry of default and proposed entry of default	0.60	255.00	153.00
10/08/2014	Leins, Christopher	Prepare correspondence regarding motion for default judgment and memorandum in support	0.10	255.00	25.50
10/13/2014	Leins, Christopher	Review and revise declarations in support of motion for summary judgment	1.00	255.00	255.00
10/13/2014	Leins, Christopher	Review and revise motion for summary judgment	0.50	255.00	127.50
10/13/2014	Leins, Christopher	Conference regarding declarations in support of motion for summary judgment	0.20	255.00	51.00
10/14/2014	Leins, Christopher	Conferences regarding revised assessment of withdrawal liability	0.50	255.00	127.50
10/14/2014	Leins, Christopher	Review file regarding revised assessment of withdrawal liability	0.20	255.00	51.00
10/14/2014	Leins, Christopher	Review and revise Dyer declaration	0.20	255.00	51.00
10/14/2014	Leins, Christopher	Draft motion for leave to file second amended complaint	0.50	255.00	127.50
10/15/2014	Leins, Christopher	Conference regarding motion for default judgment hearing	0.20	255.00	51.00
10/15/2014	Leins, Christopher	Draft and revise motion to vacate default and motion for leave to file second amended complaint	1.40	255.00	357.00
10/15/2014	Leins, Christopher	Review and revise second amended complaint	0.70	255.00	178.50
10/15/2014	Leins, Christopher	Telephone call to clerk of court regarding pretrial conference	0.10	255.00	25.50
10/15/2014	Leins, Christopher	Conference regarding acceleration of withdrawal liability and second amended complaint	0.30	255.00	76.50

10/15/2014	Leins, Christopher	Draft memorandum to trustees recommending acceleration of withdrawal liability	0.70	255.00	178.50
10/15/2014	Leins, Christopher	Prepare correspondence to Fund office regarding status of Camelot Construction, Inc. president	0.10	255.00	25.50
10/20/2014	Leins, Christopher	Review order vacating default	0.10	255.00	25.50
10/20/2014	Leins, Christopher	Prepare correspondence regarding amended complaint	0.20	255.00	51.00
11/14/2014	Leins, Christopher	Review docket and status of response to amended complaint	0.20	255.00	51.00
12/10/2014	Leins, Christopher	Review and revise motion requesting entry of default	0.30	255.00	76.50
12/10/2014	Leins, Christopher	Prepare correspondence regarding service of second amended complaint	0.10	255.00	25.50
12/11/2014	Leins, Christopher	Conference regarding request for entry of default and service by secretary of commonwealth	0.20	255.00	51.00
12/19/2014	Leins, Christopher	Review file and prepare correspondence regarding motion for default and supporting memorandum and affidavits	0.30	255.00	76.50
12/22/2014	Leins, Christopher	Review file and revise declaration in support of default judgment	0.60	255.00	153.00
12/30/2014	Leins, Christopher	Review file and revise motion for default judgment and declarations in support of motion for default judgment	1.80	255.00	459.00
12/30/2014	Leins, Christopher	Conference regarding Shaw declaration in support of motion for default judgment	0.10	255.00	25.50
01/02/2015	Leins, Christopher	Review and revise motion for default judgment and supporting affidavits	1.10	255.00	280.50
Total For Leins, Christopher M			Total Hours 47.00		Total Fees 12,067.50
<i>Naji, Sarah G.</i>					
07/23/2013	Naji, Sarah	Review asset search memo and related documents	0.20	270.00	54.00
07/23/2013	Naji, Sarah	Conference regarding asset search	0.10	270.00	27.00
01/15/2014	Naji, Sarah	Conference regarding complaint	0.10	280.00	28.00
01/22/2014	Naji, Sarah	Exchange emails regarding complaint	0.10	280.00	28.00
Total For Naji, Sarah G.			Total Hours 0.50		Total Fees 137.00
<i>Rifkind, Marc H.</i>					
02/03/2014	Rifkind, Marc	Review and revise complaint	0.30	320.00	96.00
02/11/2014	Rifkind, Marc	Review and revise complaint	0.20	320.00	64.00
04/17/2014	Rifkind, Marc	Conference regarding strategy	0.20	290.00	58.00
06/13/2014	Rifkind, Marc	Conference regarding settlement offer and response	0.30	290.00	87.00
06/23/2014	Rifkind, Marc	Review draft settlement recommendation; prepare correspondence regarding same	0.20	290.00	58.00
06/24/2014	Rifkind, Marc	Prepare correspondence regarding settlement rejection; conference regarding same	0.20	290.00	58.00
06/30/2014	Rifkind, Marc	Conference regarding settlement response	0.20	290.00	58.00
07/07/2014	Rifkind, Marc	Review and revise initial disclosures	0.20	290.00	29.00
07/23/2014	Rifkind, Marc	Review correspondence regarding settlement offer; prepare correspondence regarding same	0.20	290.00	58.00
07/24/2014	Rifkind, Marc	Conference regarding response to settlement offer	0.20	290.00	58.00
07/25/2014	Rifkind, Marc	Prepare settlement rejection recommendation	0.30	290.00	87.00
08/01/2014	Rifkind, Marc	Conference regarding response to settlement offer and discovery strategy	0.20	290.00	58.00

08/04/2014	Rifkind, Marc	Review and revise discovery requests	0.40	290.00	116.00
09/18/2014	Rifkind, Marc	Review and revise motion to strike answer	0.30	290.00	87.00
10/14/2014	Rifkind, Marc	Conference regarding strategy	0.30	290.00	87.00
10/15/2014	Rifkind, Marc	Review and revise recommendation to accelerate; conference regarding same	0.40	290.00	116.00
10/15/2014	Rifkind, Marc	Review and revise amended complaint and motion for leave	0.40	290.00	116.00
Total For Rifkind, Marc H.			Total Hours 4.50		Total Fees 1,320.00
<i>Savitsky, Shane M.</i>					
07/17/2013	Savitsky, Shane	Review email regarding new referral	0.10	150.00	15.00
07/17/2013	Savitsky, Shane	Send and receive email to open new matter number	0.10	150.00	15.00
07/17/2013	Savitsky, Shane	Review referral	0.50	150.00	75.00
07/23/2013	Savitsky, Shane	Perform asset search	1.50	150.00	225.00
07/24/2013	Savitsky, Shane	Revise asset search summary	0.40	150.00	60.00
01/10/2014	Savitsky, Shane	Conference regarding filing of complaint	0.10	155.00	15.50
01/10/2014	Savitsky, Shane	Research and review case status	0.30	155.00	46.50
01/15/2014	Savitsky, Shane	Conference regarding case status	0.20	155.00	31.00
01/15/2014	Savitsky, Shane	Draft complaint	1.20	155.00	186.00
01/15/2014	Savitsky, Shane	Conference regarding case status and possible immediate acceleration	0.20	155.00	31.00
01/15/2014	Savitsky, Shane	Research company's operating status	0.50	155.00	77.50
01/15/2014	Savitsky, Shane	Draft immediate acceleration memorandum to Fund	0.70	155.00	108.50
01/16/2014	Savitsky, Shane	Research controlled group entities	1.00	155.00	155.00
01/23/2014	Savitsky, Shane	Send email regarding controlled group status	0.10	155.00	15.50
01/27/2014	Savitsky, Shane	Review email regarding complaint revisions	0.10	155.00	15.50
02/11/2014	Savitsky, Shane	Revise complaint	0.30	155.00	46.50
02/11/2014	Savitsky, Shane	Conference regarding complaint status and revisions	0.20	155.00	31.00
02/11/2014	Savitsky, Shane	Prepare documents for complaint filing	0.30	155.00	46.50
02/12/2014	Savitsky, Shane	Prepare complaint for filing	0.20	155.00	31.00
02/14/2014	Savitsky, Shane	Update file with new entries to case docket	0.10	155.00	15.50
02/18/2014	Savitsky, Shane	Draft documents for service of complaint	0.30	155.00	46.50
02/25/2014	Savitsky, Shane	Send and review emails to process server regarding	0.20	155.00	31.00
02/25/2014	Savitsky, Shane	Research possible alternate address for service	1.00	155.00	155.00
02/28/2014	Savitsky, Shane	Telephone conference regarding service strategy	0.10	155.00	15.50
02/28/2014	Savitsky, Shane	Conference regarding service strategy	0.10	155.00	15.50
02/28/2014	Savitsky, Shane	Review and send emails regarding issues with service	0.10	155.00	15.50
02/28/2014	Savitsky, Shane	Telephone conference with Court regarding service through long arm statute	0.10	155.00	15.50
02/28/2014	Savitsky, Shane	Research Virginia long arm statute	0.50	155.00	77.50
03/06/2014	Savitsky, Shane	Draft amended summonses	0.20	155.00	31.00
03/06/2014	Savitsky, Shane	File amended summonses	0.20	155.00	31.00
03/06/2014	Savitsky, Shane	Telephone conference with clerk regarding rejection of	0.10	155.00	15.50

		amended summonses			
03/06/2014	Savitsky, Shane	Research procedure for service through Secretary of Commonwealth	0.40	155.00	62.00
03/07/2014	Savitsky, Shane	Revise amended summons	0.20	155.00	31.00
03/07/2014	Savitsky, Shane	File amended summons	0.20	155.00	31.00
03/07/2014	Savitsky, Shane	Telephone conference with Court regarding filing of amended summons	0.10	155.00	15.50
03/11/2014	Savitsky, Shane	Revise cover letter to clerk for amended summons	0.20	155.00	31.00
03/11/2014	Savitsky, Shane	Draft documents for service through Secretary of Commonwealth	0.50	155.00	77.50
03/11/2014	Savitsky, Shane	Telephone conference regarding service through Secretary of Commonwealth	0.20	155.00	31.00
03/12/2014	Savitsky, Shane	Draft documents for service through Secretary of Commonwealth	0.70	155.00	108.50
03/12/2014	Savitsky, Shane	Conference regarding document drafts for service through Secretary of Commonwealth	0.30	155.00	46.50
03/12/2014	Savitsky, Shane	Revise documents for service of process through Secretary of Commonwealth	0.20	155.00	31.00
04/11/2014	Savitsky, Shane	Review delinquency referral	0.60	145.00	87.00
04/14/2014	Savitsky, Shane	Draft amended complaint	1.80	145.00	261.00
04/16/2014	Savitsky, Shane	Prepare and review correspondence regarding amounts owed, revise amended complaint	0.50	145.00	72.50
04/18/2014	Savitsky, Shane	Revise amended complaint	0.20	145.00	29.00
04/22/2014	Savitsky, Shane	Revise amended complaint	0.20	145.00	29.00
04/22/2014	Savitsky, Shane	Draft documents for service of process	0.30	145.00	46.50
04/24/2014	Savitsky, Shane	File amended complaint and supporting documents	0.40	145.00	58.00
04/28/2014	Savitsky, Shane	Draft and revise documents for service of process via Virginia Secretary of the Commonwealth	0.40	145.00	58.00
05/07/2014	Savitsky, Shane	Update file with new entries to case docket	0.10	145.00	14.50
05/22/2014	Savitsky, Shane	Update file with new entries to case docket	0.10	145.00	14.50
05/22/2014	Savitsky, Shane	Conference regarding filed answer by opposing counsel	0.10	145.00	14.50
06/11/2014	Savitsky, Shane	Prepare and review correspondence regarding delinquency amounts owed	0.10	145.00	14.50
06/11/2014	Savitsky, Shane	Review delinquent amounts	0.30	145.00	43.50
07/24/2014	Savitsky, Shane	Prepare and review correspondence regarding total amounts owed by company	0.20	145.00	29.00
07/25/2014	Savitsky, Shane	Review and revise full amounts owed by company	0.20	145.00	29.00
09/05/2014	Savitsky, Shane	Review amounts owed for settlement negotiations	0.30	145.00	43.50
09/05/2014	Savitsky, Shane	Prepare and review correspondence regarding amounts owed for settlement negotiations	0.10	145.00	14.50
09/19/2014	Savitsky, Shane	Revise motion to strike answer and supporting documents	0.50	145.00	72.50
09/19/2014	Savitsky, Shane	Prepare and review correspondence regarding revisions to motion to strike answer and supporting documents	0.10	145.00	14.50
09/19/2014	Savitsky, Shane	File motion to strike answer and supporting documents	0.50	145.00	72.50
09/23/2014	Savitsky, Shane	Review file regarding new entry to case docket	0.10	145.00	14.50

10/03/2014	Savitsky, Shane	Prepare entry of default documents	0.30	145.00	43.50
10/03/2014	Savitsky, Shane	Telephone conference regarding entry of default documents	0.10	145.00	14.50
10/03/2014	Savitsky, Shane	Prepare and review correspondence regarding entry of default documents	0.10	145.00	14.50
10/03/2014	Savitsky, Shane	Review file regarding new entries to case docket	0.10	145.00	14.50
10/06/2014	Savitsky, Shane	Prepare and review correspondence regarding entry of default documents	0.10	145.00	14.50
10/06/2014	Savitsky, Shane	File entry of default documents	0.30	145.00	43.50
10/06/2014	Savitsky, Shane	Review file regarding new entries to case docket	0.10	145.00	14.50
10/08/2014	Savitsky, Shane	Prepare and review correspondence regarding motion for default judgment	0.10	145.00	14.50
10/13/2014	Savitsky, Shane	Prepare motion for default judgment documents	2.00	145.00	290.00
10/14/2014	Savitsky, Shane	Prepare and revise documents for motion for default judgment	2.60	145.00	377.00
10/14/2014	Savitsky, Shane	Telephone conference with Fund regarding motion for default judgment	0.10	145.00	14.50
10/14/2014	Savitsky, Shane	Conference regarding withdrawal liability revision	0.20	145.00	29.00
10/14/2014	Savitsky, Shane	Prepare and review correspondence regarding motion for default judgment	0.20	145.00	29.00
10/15/2014	Savitsky, Shane	Prepare and review correspondence regarding motion for leave to file amended complaint	0.20	145.00	29.00
10/15/2014	Savitsky, Shane	Prepare, revise second amended complaint	1.50	145.00	217.50
10/15/2014	Savitsky, Shane	Revise motion for vacate entry of default and for leave to file second amended complaint	0.30	145.00	43.50
10/15/2014	Savitsky, Shane	File motion to vacate entry of default and for leave to file second amended complaint	0.50	145.00	72.50
10/20/2014	Savitsky, Shane	Prepare and review correspondence regarding filing of second amended complaint	0.20	145.00	29.00
10/21/2014	Savitsky, Shane	File second amended complaint and supporting documents	0.40	145.00	58.00
10/21/2014	Savitsky, Shane	Telephone conference with Court regarding amended complaint filing	0.20	145.00	29.00
10/28/2014	Savitsky, Shane	Prepare documents for service via longarm statute	0.40	145.00	58.00
11/03/2014	Savitsky, Shane	Prepare documents for filing via longarm statute	0.50	145.00	72.50
11/03/2014	Savitsky, Shane	Prepare and review correspondence regarding service via longarm statute	0.10	145.00	14.50
11/19/2014	Savitsky, Shane	Review file regarding new entry to case docket	0.10	145.00	14.50
11/19/2014	Savitsky, Shane	Prepare and review correspondence regarding case deadlines	0.10	145.00	14.50
12/09/2014	Savitsky, Shane	Prepare and review correspondence regarding entry of default documents	0.10	145.00	14.50
12/09/2014	Savitsky, Shane	Prepare entry of default documents	0.30	145.00	43.50
12/09/2014	Savitsky, Shane	Review and revise motion for default judgment documents	0.20	145.00	29.00
12/10/2014	Savitsky, Shane	Conference regarding entry of default documents	0.10	145.00	14.50
12/10/2014	Savitsky, Shane	Review motion for default judgment documents	0.20	145.00	29.00
12/11/2014	Savitsky, Shane	Revise entry of default documents	0.10	145.00	14.50
12/11/2014	Savitsky, Shane	Conference regarding entry of default documents	0.10	145.00	14.50
12/11/2014	Savitsky, Shane	File entry of default documents	0.20	145.00	29.00
12/12/2014	Savitsky, Shane	Review file regarding new entry to case docket	0.10	145.00	14.50

12/12/2014	Savitsky, Shane	Review motion for default judgment documents	0.20	145.00	29.00
12/19/2014	Savitsky, Shane	Prepare and review correspondence regarding motion for default judgment	0.10	145.00	14.50
12/19/2014	Savitsky, Shane	Review and revise motion for default judgment documents	0.30	145.00	43.50
12/22/2014	Savitsky, Shane	Review and revise motion for default judgment documents	2.00	145.00	290.00
12/22/2014	Savitsky, Shane	Prepare and review correspondence regarding motion for default judgment documents	0.10	145.00	14.50
12/22/2014	Savitsky, Shane	Conference regarding motion for default judgment documents	0.10	145.00	14.50
12/23/2014	Savitsky, Shane	Review and revise motion for default judgment documents	1.00	145.00	145.00
12/23/2014	Savitsky, Shane	Prepare and review correspondence regarding settlement recommendation	0.10	145.00	14.50
12/29/2014	Savitsky, Shane	Revise motion for default judgment documents	1.50	145.00	217.50
12/30/2014	Savitsky, Shane	Review and revise motion for default judgment documents	1.50	145.00	217.50
12/30/2014	Savitsky, Shane	Conference regarding revisions to motion for default judgment documents	0.20	145.00	29.00

Total For Savitsky, Shane M.

**Total Hours
40.40**

**Total Fees
5,985.00**

Total For Time Entries

**Total Hours
95.30**

**Total Fees
19,959.00**

0748.000303: Camelot Construction

Cost Item

<i>Date Worked</i>	<i>Description</i>				<i>Bill Value</i>
Cost Entries					
<i>Asset Search (Autotrack)</i>					
07/31/2013	0768.000303: Camelot Construction, Inc. (Retainer)	461919	30.21	LexisNexis Risk Solutions GA Inc.: July 2013 Billing Statement	0
	Billed		30.21		
		8888	30.21	SUMMARY PHRASE: CADBT CADBT	TEB
02/28/2014	0768.000303: Camelot Construction, Inc. (Retainer)	471328	14.28	LexisNexis Risk Solutions GA Inc.: 1/31/14 billing statement	0
	Billed		14.28		
		29525	14.28	SUMMARY PHRASE: CADBT CADBT	JM

Total For Asset Search (Autotrack)

**Billed Costs
44.49**

Courier

02/28/2014	0768.000303: Camelot Construction, Inc. (Retainer)	472727	23.13	Washington Express: 2/28/14 Billing Statement, Courier Services	0
	Billed		23.13		
		29579	23.13	SUMMARY PHRASE: CACO CACO	DMS
04/10/2014	0768.000303: Camelot Construction, Inc. (Retainer)	474404	177.90	Washington Express: Washington Express: 3/31/14 Billing Statement, Courier Services	0
	Billed		177.90		
		29658	177.90	SUMMARY PHRASE: CACO CACO	SLK

11/10/2014	Washington Express: courier 10/31/14				53.88
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Total For Courier

**Billed Costs
254.91**

Court fees

02/11/2014	0768.000303: Camelot Construction, Inc. (Retainer)	471177	400.00	Clerk, US District Court: court fees: 2/11/14 filing fee for complaint	0
	Billed		400.00	(SMS/CML)	
		29473	400.00		DMS

Total For Court fees

**Billed Costs
400.00**

Legal Research

10/13/2014	Lexis-Nexis: legal research 9/30/14	165.36
10/13/2014	Lexis-Nexis: legal research 9/30/14	140.33

Total For Legal Research

**Billed Costs
305.69**

Miscellaneous expenses

10/29/2014	Office of the Secretary of the Commonwealth: fees for service of document	28.00
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Total For Miscellaneous expenses

**Billed Costs
28.00**

Overnight Delivery

02/28/2014	0768.000303: Camelot Construction, Inc. (Retainer)	471334	21.80	United Parcel Service: 2/22/14 billing statement	0
	Billed		21.80		
		29536	21.80	SUMMARY PHRASE: CAOD CAOD	JM
05/06/2014	0768.000303: Camelot Construction, Inc. (Retainer)	476850	52.50	Washington Express: 03/31/14 Billing Statement, Courier Services	0
	Billed		52.50		
		29754	52.50	SUMMARY PHRASE: CAOD CAOD	SLK
10/14/2014	United Parcel Service: overnight delivery 9/27/14 billing statement				17.91
11/10/2014	United Parcel Service: overnight delivery 10/18/14 billing statement				17.91

Total For Overnight Delivery

**Billed Costs
110.12**

Pacer Service Center

06/30/2014	Pacer Service Center: April - June 2014 billing statement	0.40
10/29/2014	Pacer Service Center: July - September billing statement	3.80

Total For Pacer Service Center

**Billed Costs
4.20**

Photocopying

08/21/2014	Photocopying	3.15
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Total For Photocopying

**Billed Costs
3.15**

Postage

03/12/2014	0768.000303: Camelot Construction, Inc. (Retainer)	474156	19.28	Postage	0
	Billed		19.28	SUMTER ZAKIA D	
			19.28	SUMMARY PHRASE: EXPOST EXPOST	
04/28/2014	0768.000303: Camelot Construction, Inc. (Retainer)	476573	8.24	Postage	0
	Billed		8.24	SUMTER ZAKIA D	
			8.24	SUMMARY PHRASE: EXPOST EXPOST	
04/28/2014	0768.000303: Camelot Construction, Inc. (Retainer)	476574	1.82	Postage	0
	Billed		1.82	SUMTER ZAKIA D	
			1.82	SUMMARY PHRASE: EXPOST EXPOST	
07/08/2014	Postage				0.69
08/04/2014	Postage				1.61
10/06/2014	Postage				0.48
10/15/2014	Postage				1.82
11/04/2014	Postage				9.99

Total For Postage

**Billed Costs
38.53**

Process server fees

03/06/2014	0768.000303: Camelot Construction, Inc. (Retainer)	471371	28.00	Office of the Secretary of the Commonwealth: Service of Process	0
	Billed	29543	28.00	(0768.000303/CML)	JM
03/14/2014	0768.000303: Camelot Construction, Inc. (Retainer)	472689	222.00	Capitol Process Services: 3/4/14 Service of process to Camelot Construction. c/o Anthony Pipito, Registered Agent	0
	Billed	29554	222.00	(0768.00303/CML)	DMS
04/28/2014	0768.000303: Camelot Construction, Inc. (Retainer)	474470	28.00	Office of the Secretary of the Commonwealth: 04/28/14 fees for service of process by Secretary of State	0
	Billed	29670	28.00		DMS
Total For Process server fees					Billed Costs 278.00
<i>Telephone</i>					
06/23/2014	5052665878 Telephone				1.18
06/23/2014	5052665878 Telephone				2.66
08/28/2014	5055081218 Telephone				0.30
08/28/2014	5055081218 Telephone				0.30
09/04/2014	5052160786 Telephone				7.08
09/05/2014	5052160786 Telephone				0.59
09/09/2014	5052160786 Telephone				0.59
10/22/2014	4158827900 Telephone				0.59
Total For Telephone					Billed Costs 13.29
Totals For Cost Entries					Billed Costs 1,480.38
Report Totals					
			Printed Hours	Printed Fees	Billed Costs
			95.30	19,972.00	1,480.38